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*LG Electronics USA, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR., DAVID  
ESPINOZA, and CHRISTOPHER MILLS, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

LG ELECTRONICS, INC., LG  
ELECTRONICS U.S.A., INC., SAMSUNG  
ELECTRONICS CO. LTD., SAMSUNG  
ELECTRONICS AMERICA, INC., SONY  
CORPORATION, and SONY  
ELECTRONICS CORPORATION, and  
John and Jane Does (1-Unlimited), and ABC  
Corporations (1-Unlimited),

Defendants.

Civil Action No. 17-cv-1775 (MCA) (SCM)

**DECLARATION OF JEFFREY J.  
GREENBAUM IN SUPPORT OF  
ADMISSION *PRO HAC VICE* OF  
MICHAEL H. RUBIN, ESQ., AND  
BRIAN M. WILLEN, ESQ.**

JEFFREY J. GREENBAUM, under penalty of perjury, declares as follows:

1. I am a member of the law firm of Sills Cummis & Gross P.C., attorneys for defendant LG Electronics U.S.A., Inc. (“LG Electronics”) in the above-captioned action. I am counsel of record for LG Electronics in this matter, and submit this Declaration in support of the

*pro hac vice* admission of Michael H. Rubin, Esq., of Wilson Sonsini Goodrich & Rosati, P.C., in San Francisco, California, and Brian M. Willen, Esq., of Wilson Sonsini Goodrich & Rosati, P.C., in New York, New York, as counsel for LG Electronics.

2. Messrs. Rubin and Willen are counsel to LG Electronics and are familiar with the facts of this action, and have experience in the field of law relevant to this action.

3. As set forth in the accompanying Declaration of Michael H. Rubin, he is a member in good standing in all of the jurisdictions in which he has been admitted to practice. There has never been a disciplinary proceeding against Mr. Rubin in any jurisdiction in which he is, or has been, admitted to practice.

4. As set forth in Mr. Rubin's Declaration, in the event he is admitted *pro hac vice* in this action, he will comply with all of the requirements of L. Civ. R. 101.1.

5. As set forth in the accompanying Declaration of Brian M. Willen, he is a member in good standing all of the jurisdictions in which he has been admitted to practice. There has never been a disciplinary proceeding against Mr. Willen in any jurisdiction in which he is, or has been, admitted to practice.

6. As set forth in Mr. Willen's Declaration, in the event he is admitted *pro hac vice* in this action, he will comply with all of the requirements of L. Civ. R. 101.1.

7. Upon admission *pro hac vice* of Messrs. Rubin and Willen, I will continue to participate and serve as counsel of record in this matter and will comply with all of the requirements of L. Civ. R. 101.1.

8. Specifically, as required by L. Civ. R. 101.1(c)(4), I will continue to receive all notices, orders and pleadings, and file all papers, enter appearances for parties, sign stipulations, and sign and receive payments on judgment, decrees or orders.

9. I will also appear at all proceedings, unless otherwise excused by the Court, and have all pleadings, briefs and other papers signed by myself, or another Sills Cummis & Gross P.C. attorney authorized to practice before this Court.

10. As required by L. Civ. R. 101.1(d), I will continue to strictly observe the dates fixed for scheduling conferences, motions, pretrial conferences, trials and any other proceedings.

11. Counsel for Plaintiffs has no opposition to the admission *pro hac vice* of Messrs. Rubin and Willen.

12. As counsel of record, I will be responsible for the conduct of the cause and counsel in this matter.

13. For the foregoing reasons, it is respectfully requested that the Court enter an Order admitting Messrs. Rubin and Willen to appear *pro hac vice* before this Court for all further proceedings in this case.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on July 10, 2017.

s/Jeffrey J. Greenbaum  
JEFFREY J. GREENBAUM